



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SDD
F. #2011R00783

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 11, 2015

By ECF

Honorable John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Agron Hasbajrami
Criminal Docket No. 11-623 (S1) (JG)

Dear Judge Gleeson:

The government writes to inform the Court that, earlier today, it received concurrence to provide the defendant with direct access to certain sensitive material that was produced previously to cleared defense counsel in the above-referenced case. The government will work with defense counsel regarding the logistical arrangements necessary to make this information available to the defendant in a setting in which he may personally review it.

In addition, on April 29, 2015, the Court informed the parties that a questionnaire will be used for jury selection. The Court also encouraged the parties to agree upon a proposed questionnaire, and directed the parties to provide such a proposal to the Court on or before May 8, 2015.

Counsel for the defendant provided the government with a proposed questionnaire on Monday, May 4, 2015, in anticipation of the Court's deadline. As the Court has doubtless noticed, as of today, the parties have not yet filed an agreed proposed questionnaire. However, the parties are in final discussions and expect to reach at least some level of agreement imminently. Accordingly, the government respectfully requests a brief extension, until Wednesday, May 13, 2015, by which to file a joint questionnaire.

To the extent that the parties cannot reach agreement in all respects as to the final form of the questionnaire, the government will provide a clear indication to the Court of any questions in dispute.

Respectfully submitted,

KELLY T. CURRIE
Acting United States Attorney

By: _____ /s/
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cc: Defense Counsel of Record, via ECF and email